

# **EXHIBIT 4**

**EXHIBIT T**  
**(FILED UNDER SEAL)**

MORRISON | FOERSTER

2000 PENNSYLVANIA AVE , NW  
WASHINGTON, D C  
20006-1888  
TELEPHONE: 202 887 1500  
FACSIMILE: 202 887 0763  
WWW MOFO COM

MORRISON & FOERSTER LLP  
NEW YORK, SAN FRANCISCO,  
LOS ANGELES, PALO ALTO,  
SACRAMENTO, SAN DIEGO,  
DENVER, NORTHERN VIRGINIA,  
WASHINGTON, D.C.  
TOKYO, LONDON, BRUSSELS,  
BEIJING, SHANGHAI, HONG KONG,  
SINGAPORE

February 25, 2013

Writer's Direct Contact

202.887.8775

JHartman@mofo.com

**Highly Confidential – Attorneys Eyes Only**

*Via Electronic Mail*

Chris Franklin  
WILMER CUTLER PICKERING HALE AND DOOR LLP  
950 Page Mill Road  
Palo Alto, CA 94304  
Christopher.Franklin@wilmerhale.com

**Re: MediaTek Inc. v. Freescale Semiconductor, Inc., No. 4:11-cv-05341 (YGR)**

Dear Chris:

I write in response to Nathan Walker's email regarding alleged deficiencies in Freescale's production of documents providing financial information for Freescale's accused products. Specifically, Nathan asserted that a number of Freescale products were improperly omitted from documents bearing the Bates ranges FSL-00125852, FSL-00125853–955, FSL-00125956–70, FSL-00125971-6004, and FSL-00126005–12.

As I informed you during our February 15 telephonic meet-and-confer, Freescale has investigated the allegedly omitted products and found that none of the products identified by Nathan were improperly excluded. In particular, all of the products that Nathan identified fall into one of four categories: (1) products that Freescale has not sold; (2) products that Freescale has not sold within the U.S.; (3) [REDACTED]

[REDACTED]  
and (4) [REDACTED]

The specific products are addressed below.

1. **No sales of identified products.** Freescale has not sold the following product numbers identified by Nathan:

- KMC8358CVVAGDGA
- KMC8358CZUAGDGA

MORRISON | FOERSTER

Chris Franklin  
February 25, 2013  
Page Two

- KMC8358ECVRAGDDA
- KMC8358ECVRAGDGA
- KMC8358ECVVAGDGA
- KMC8358ECZQAGDDA
- KMC8358ECZQAGDGA
- KMC8358ECZUAGDGA
- KMC8360CZUAJDGA
- KMC8360ECVVAJDGA
- KMC8360ECZUAJDGA
- KMPC8358CVRAGDGA
- KMPC8358CVVAGDG
- KMPC8358CZQAGDDA
- KMPC8358CZQAGDGA
- KMPC8358CZUAGDG
- KMPC8358ECVVAGDG
- KMPC8358EVRAAGDDA
- KMPC8358EVRAGDGA
- KMPC8358EVVAGDG
- KMPC8358EZQAGDDA
- KMPC8358EZQAGDGA
- KMPC8358EZUAGDG
- KMPC8358VRAGDDA
- KMPC8358VRAGDGA
- KMPC8358VVAGDGA
- KMPC8358ZQAGDDA
- KMPC8358ZQAGDGA
- KMPC8358ZUAGDG
- KMPC8358ZUAGDGA
- KMPC8360EVVAHFH
- KMPC8360EVVAHFHA
- KMPC8360EVVALFGA
- KMPC8360EZUAHFH
- KMPC8360EZUAHFHA
- KMPC8360EZUAJDG
- KMPC8360EZUAJDGA
- KMPC8360EZUALFG
- KMPC8360EZUALFGA
- KMPC8360VVAHFH

MORRISON | FOERSTER

Chris Franklin  
February 25, 2013  
Page Three

- KMPC8360VVAHFHA
- KMPC8360VVALFGA
- KMPC8360ZUAHFH
- KMPC8360ZUAHFHA
- KMPC8360ZUALFG
- KMPC8360ZUALFGA
- KMPC8360ZUALFHA
- MCF52210CVM66J
- MCF52211CVM66J
- MCF52211CVM80J
- MCF52256CVN66J
- MCF52256VN80J
- MCF52268AG80
- MCF52268VN80J
- MCFE52256CVN66
- MCFE52256VN80
- MCFE52258CVN66
- MCFE52258VN80
- MCIMX31CJKN5DR2
- MCIMX31CJMN4DR2
- MCIMX31CVKN5CR2
- MCIMX31CVKN5DR2
- MCIMX31CVMN4DR2
- MCIMX31DJKN5D
- MCIMX31DJKN5DR2
- MCIMX31DVKN5C
- MCIMX31DVKN5CR2
- MCIMX31DVKN5R2
- MCIMX31DVMN5C
- MCIMX31DVMN5CR2
- MCIMX31DVMN5DR2
- MCIMX31LCJMN4D
- MCIMX31LCJMN4DR2
- MCIMX31LCVKN5CR2
- MCIMX31LDVKN5C
- MCIMX31LDVKN5CR2
- MCIMX31LDVMN5C
- MCIMX31LDVMN5CR2

MORRISON | FOERSTER

Chris Franklin  
February 25, 2013  
Page Four

- MCIMX31LDVMN5DR2
- MCIMX31VKN5BR2
- MCIMX31VMN5BR2
- MCIMX31VMN5CR2
- MCIMX351AJM4B
- MCIMX351AJM4BR2
- MCIMX351AJM5B
- MCIMX351AJM5BR2
- MCIMX351AJQ5B
- MCIMX351AJQ5BR2
- MCIMX351AJQ5CR2
- MCIMX351AVM5B
- MCIMX351AVM5BR2
- MCIMX353CJQ5CR2
- MCIMX353CVM5BR2
- MCIMX353DVM5BR2
- MCIMX355AJM4B
- MCIMX355AJM4B
- MCIMX355AJM4BR2
- MCIMX355AJM4BR2
- MCIMX355AJM5B
- MCIMX355AJM5B
- MCIMX355AJM5BR2
- MCIMX355AJM5BR2
- MCIMX355AJQ5B
- MCIMX355AJQ5B
- MCIMX355AJQ5BR2
- MCIMX355AJQ5BR2
- MCIMX355AJQ5CR2
- MCIMX355AJQ5CR2
- MCIMX355AVM4BR2
- MCIMX355AVM4BR2
- MCIMX357CJM5B
- MCIMX357CJM5BR2
- MCIMX357CVM5BR2
- MCIMX502EVM8B
- MCIMX503CVK8B
- MCIMX503CVK8BR2

MORRISON | FOERSTER

Chris Franklin  
February 25, 2013  
Page Five

- MCIMX503CVM8BR2
- MCIMX503EVM8B
- MCIMX508CVM8BR2
- MCIMX508CZK8B
- MCIMX512DJM8CR2
- MCIMX513CJM6CR2
- MCIMX513DJM8CR2
- MCIMX515DJK8C
- MPC8358CVRAGDGA
- MPC8358CVVADDE
- MPC8358CVVAGDG
- MPC8358CZQADDAA
- MPC8358CZQAGDDA
- MPC8358CZUADDE
- MPC8358CZUAGDG
- MPC8358CZUAGDGA
- MPC8358ECVRAGDGA
- MPC8358ECVVADDE
- MPC8358ECVVADDEA
- MPC8358ECVVAGDGA
- MPC8358ECZQADDAA
- MPC8358ECZQAGDDA
- MPC8358ECZUADDE
- MPC8358ECZUADDEA
- MPC8358ECZUAGDG
- MPC8358EVRA/DDA
- MPC8358EVVADDEA
- MPC8358EZQADDAA
- MPC8358EZUADDE
- MPC8358ZQADDAA
- MPC8358ZQAGDGA
- MPC8358ZUAGDGA
- MPC8360ECZUAGDG
- MPC8360ECZUAGDGA
- MPC8360EVVAHFH
- MPC8360EZUAHFH

MORRISON | FOERSTER

Chris Franklin  
February 25, 2013  
Page Six

- MPC8360VVAHFH
- MPC8360ZUAHFH
- MPC8360ZUALFG
- PCF52211CEP66
- PCF52252AF80
- PCF52252CAF66
- PCF52254AF80
- PCF52255CAF80
- PCF52256AG80
- PCF52256CAG66
- PCF52256CVN66
- PCF52256VN80
- PCF52258AG80
- PCF52258CVN66
- PCF52259CVN80
- PCIMX31CVMN4R2
- PCIMX31LCVMF4CR2
- PCIMX31LCVMN5B
- PCIMX31LCVMN5BR2
- PCIMX31LVKN5CR2
- PCIMX31LVZN5
- PCIMX31LVZN5C
- PCIMX31LVZN5CR2
- PCIMX31LVZN5R2
- PCIMX31VKN5CR2
- PCIMX31VKN5R2
- PCIMX31VMN5B
- PCIMX31VMN5BR2
- PCIMX351AVM4B
- PCIMX351AVM4BR2
- PCIMX355AVM5B
- PCIMX355AVM5B
- PCIMX355AVM5BR2
- PCIMX355AVM5BR2
- PCIMX357CJM5B
- PCIMX357CJM5BR2
- PCIMX357CJQ5C
- PCIMX357CJQ5CR2

MORRISON | FOERSTER

Chris Franklin  
February 25, 2013  
Page Seven

- PCIMX357CVM5BR2
- PCIMX515DVM8C
- SCIMX31DVKN6C
- SCIMX31DVKN6CR2
- SCIMX31LCVMN5B
- SCIMX31LCVMN5BR2
- SCIMX31LDVKN6C
- SCIMX31LDVKN6CR2
- SCIMX31LVKM5
- SCIMX31LVKN5
- SCIMX31LVKN5R2
- SCIMX31LVKT5
- SCIMX31LVKT5R2
- SCIMX353DJQ5C
- SCIMX357DJQ5C
- SCIMX357DJQ5CR2

**2. No U.S. sales of identified products.** Freescale has not sold the following product numbers identified by Nathan in the United States:

- KMC8360CVVAJDGA
- KMPC8358CVRAGDDA
- KMPC8358ECZUAGDG
- KMPC8358EVVAGDGA
- KMPC8358EZUAGDGA
- KMPC8360CVVAJDG
- KMPC8360ECVVAJDG
- KMPC8360ECZUAJDG
- KMPC8360EVVAJDG
- KMPC8360EVVAJDGA
- KMPC8360EVVALFG
- KMPC8360EVVALFHA
- KMPC8360VVAJDG
- KMPC8360VVAJDGA
- KMPC8360VVALFG
- KMPC8360VVALFHA
- MCIMX31CVMN4D
- MCIMX31DVKN5DR2

MORRISON | FOERSTER

Chris Franklin

February 25, 2013

Page Eight

- MCIMX31LCVKN5DR2
- MCIMX355AVM5BR2
- MCIMX355AVM5BR2
- MCIMX357DJQ5CR2
- MCIMX502CVK8B
- MCIMX508CVK8BR2
- MCIMX512CJM6CR2
- MCIMX515CJM6CR2
- MCIMX515DJM8CR2
- MCIMX515DVK8B
- MCIMX515DVM8B
- MPC8358CVRADDDA
- MPC8358CVVADDEA
- MPC8358ECVRADDDA
- MPC8358EVRAGDGA
- MPC8358EZQAGDGA
- MPC8358VRADDDA
- MPC8358VRAGDGA
- MPC8358ZQAGDDA
- MPC8360CZUAGDGA
- MPC8360ZUAGDG
- MPC8360ZUAGDGA
- PCIMX515DVK8C
- PCIMX516AJM6CR2

As the parties have previously discussed, despite Freescale's objections that worldwide sales data are not relevant, MediaTek has insisted that Freescale produce such data. Consequently, sales data for these product numbers should be included when Freescale produces worldwide sales data later this week.

3. **No sales during the relevant time period.** The below products identified by Nathan are only accused of infringing the '331 patent.
- [REDACTED]
- [REDACTED]
- i [REDACTED]

MORRISON FOERSTER

Chris Franklin  
February 25, 2013  
Page Nine

卷之三

- 4. Identified products included in sales documents.** Contrary to MediaTek's assertions, the product numbers identified below are included in the following documents:

MORRISON | FOERSTER

Chris Franklin  
February 25, 2013  
Page Ten

Sincerely,

/s/ Joshua A. Hartman

Joshua A. Hartman